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MEMO ENDORSED

March 25, 2022

3/28/22

Requested Modification
Granted

Colleen McMahon

Via ECF

Honorable Colleen McMahon
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

RE: United States v. Tiran Branch
22 cr 82(CM)

Dear Judge McMahon,

I represent Tiran Branch in the above matter. I am writing to request that the travel restriction ordered in regard to Tiran Branch be expanded to include additional jurisdictions within the United States.

Tiran Branch has pursued and obtained employment as a Driver Sales Representative for XPO Logistics. As such, Tiran Branch is required to drive freight loads to various locations inside and outside of New York State. No trip requires an overnight stay. Tiran Branch is on electronic monitoring through use of an electronic ankle bracelet. Tiran Branch is currently restricted to travel within the SDNY, EDNY, WDNY and NDNY.

I have provided employment documentation that includes locations to which Tiran Branch will be required to travel to Tiran Branch's Pre-Trial Services Officer Leo Barrios. I have also provided that documentation to the Government. I am attaching, herein, that documentation and Tiran Branch's first weekly pay stub as an exhibit to this request. As indicated in the list the locations where Tiran Branch will be required to make freight deliveries which are outside his current travel limitations are located at Hagerstown, Maryland; Burlington, Vermont; St. Johnsbury, Vermont; Manchester, New Hampshire; South Boston, Massachusetts; Worcester, Massachusetts; Emigsville, Pennsylvania; and Clearfield, Pennsylvania.

I have been informed by Pre-Trial Officer Leo Barrios that he does not object to the change in travel restrictions that would permit Tiran Branch to fulfill his employment obligations. Additionally, I am informed by AUSA Alexander Li that the government takes no position on the change and defers to the Court and Pre-Trial Services.

For the foregoing reasons I ask that the Court permit travel by Tiran Branch outside the current travel restriction area solely for the purpose of performing his work functions as a driver for XPO Logistics.

Sincerely,

Kyle B. Watters

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KBW/mh